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February 2, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: 2010 Biennial Regulatory Review of Regulations Administered by the
International Bureau, IB Docket 10-268

Reporting Requirements for U.S. Providers of International Telecommunications
Services, IB Docket No. 04-112

Joint Petition for Rulemaking to Further Reform the International Settlements
Policy, RM-11322

Petition Pursuant to Rule 64.1002(d) Requesting Issuance of Settlements Stop
Payment Order on the US-Tonga Route, IB Docket No. 09-10

The Effect of Mobile Termination Rates on U.S Customers, IB Docket 04-398

A National Broadband Plan for Our Future, GN Docket No. 09-51

International Comparison and Consumer Survey Requirements in the Broadband
Data Improvement Act, GN Docket No. 09-47

Dear Ms. Dortch:

On February 1, 2011 Eric Loeb, James Talbot and the undersigned met with Mindel De La Torre, James Ball, Kiran Duwadi, Jennifer Gilsenan, Francis Gutierrez, David Krech, George Li, Kathryn O'Brien, Julie Saulnier, Walt Strack, David Strickland, Thomas Sullivan, and Mark Uretsky. Participating by telephone were Kimberly Cook, Narda Jones, Richard Lerner, Roxanne McElvane, and Tracey Weisler.

In particular, we discussed AT&T's recently filed comments in the above-referenced 2010 Biennial Review proceeding which seek the removal or significant streamlining of the Section 43.61 International Traffic and Section 43.82 Circuit Status Reports, and removal of the

International Settlements Policy (“ISP”) and its associated filing requirements from the remaining international routes on which this policy still applies. As part of this discussion, we explained the substantial burdens these outdated reporting requirements place on U.S. international carriers, we described why the collected data no longer provide any meaningful benefit to the Commission in support of the original policy justifications for collecting the data, and expressed our support for early Commission action on the proposed streamlining measures. We urged that the record in these proceedings may be viewed as fresh, but that if there are to be further proceedings to refresh the record, the Commission should take early action on the existing record to remove certain clearly outdated reporting requirements, such as the quarterly traffic reports required by Section 43.61(b). We also noted the benefits to U.S. consumers from the Commission’s 2004 reform of the ISP on routes accounting for 98 percent of U.S. international traffic and our support for the commencement of a rulemaking to extend these reforms to all U.S. international routes.

In regard to the Settlements Stop Payment Order on the U.S.-Tonga Route, we explained that AT&T’s circuits on this route remain unconnected. We reiterated AT&T’s support for the enforcement of the \$0.19 benchmark rate on U.S.-Tonga calls routed via third countries, as a further remedy in the current proceeding.

We also noted significant reductions over the last five years in mobile termination rates paid to foreign carriers. Given these encouraging trends, we stated that AT&T does not believe further Commission action on this matter is necessary at this time.

In addition, we discussed the ongoing work of the U.S. Government with the Organisation for Economic and Co-operative Development (OECD) to refine the methodologies for constructing its telecommunication price baskets and broadband penetration measurements. We noted that although the OECD has recently proposed some improvements, flaws remain that should be improved in order to strengthen the validity and usefulness of certain OECD comparisons.

One electronic copy of this Notice is being submitted in the above-referenced proceedings in accordance with Section 1.1206 of the Commission’s rules.

Sincerely,



cc: Mindel De La Torre James Ball
Kimberly Cook Kiran Duwadi
Jennifer Gilsenan Francis Gutierrez
Narda Jones David Krech
Richard Lerner George Li
Roxanne McElvane Kathryn O’Brien
Julie Saulnier Walt Strack
David Strickland Thomas Sullivan
Mark Uretsky Tracey Weisler